

Comments in Favor of RM-11620
Changes Proposed to Section 73.215
Bromo Communications, Inc.

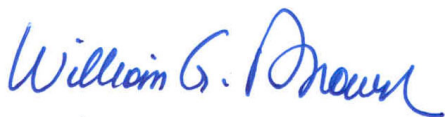
March 2011

These comments support Proposed Rulemaking RM-11620 by Calvary Chapel, of Costa Mesa, Inc. RM-11620 proposes to modify the procedure in Section 73.215 for calculating the class maximum facilities of Section 73.207 stations in the limited cases where the class maximum antenna height is calculated to be underground.

There are times in a Section 73.215 proposal that a short spaced Section 73.207 station is located on a site with higher elevation. With a height above average terrain greater than maximum class and the power adjusted to compensate for the larger distance to contours due to the height, per Section 73.215, the engineer must re-calculate the facility. Many times this can theoretically place the antenna underground. For example, a Class B station has a maximum power of 50 kW and a height above average terrain of 150 meters. If that station was mounted on a mountain so that the height above average terrain was 300 meters, it is possible that the maximum height above average terrain is 150 meters underground. An antenna buried 150 meters will not radiate. However, when we calculate the interfering contour using the F50/10 curves, the distance to the contour is greater than if the station was operating on top of the mountain at the higher HAAT and lower power. This is due to an anomaly in the FCC F50/50 and F50/10 distance charts.

The situation described in RM-11620 does not occur very often, but when it does it can present major problems in the applicant's ability to locate the antenna at a site rendering the best coverage possible. The first time the engineer discovers the problem is during the initial feasibility study phase of the project. The engineer discusses the results of the study with the applicant stating the proposed site will not be acceptable per Section 73.215. At that point it is usually decided to move to an alternative plan. Many times the alternative plans are not as desirable. In some situations there will be no location that will meet the provisions of Section 73.215 due to environmental issues, zoning or other reasons. Adoption of the Proposed Rulemaking could allow the use of the most desirable site where it would be unusable under the present procedures as described in Section 73.215.

We applaud the efforts of Calvary Chapel and its lawyers and engineers in presenting this proposal. We feel they have done an excellent job determining the problem and finding a cure. The proposal as contained in RM-11620 is good in that it is not disruptive as it only affects the FCC F50/10 interfering contour calculation when concerning stations that would be considered underground when calculating maximum class facilities under Section 73.215.



Bromo Communications, Inc.